

**Hearing Date: May 16, 2012 at 10:00 a.m.**  
**Response Deadline: May 14, 2012 at 5:00 p.m.**

**BAKER & MCKENZIE LLP**  
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**Attorneys for LANDIS INVERSIONES S.L.**

**UNITED STATES BANKRUPTCY COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES INVESTOR PROTECTION**  
**CORPORATION,**

Plaintiff-Applicant,

v.

**BERNARD L. MADOFF INVESTMENT**  
**SECURITIES LLC,**

Defendant.

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In re:

**BERNARD L. MADOFF,**

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Debtor.

**IRVING H. PICARD, Trustee for the**  
**Liquidation of Bernard L. Madoff Investment**  
**Securities LLC,**

Plaintiff,

v.

**LANDIS INVERSIONES S.L.,**

Defendant.

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

Ad. Pro. No. 11-02930 (BRL)

**JOINDER BY LANDIS INVERSIONES S.L. IN OPPOSITION TO THE TRUSTEE'S  
MOTION TO REQUIRE DEFENDANTS TO MAKE EXPEDITED DISCLOSURE OF  
THE IDENTITY AND ADDRESSES OF CUSTOMERS OR FORMER CUSTOMERS OR,  
ALTERNATIVELY, TO PROVIDE CERTAIN NOTICES TO THOSE CUSTOMERS  
AND FORMER CUSTOMERS**

Defendant LANDIS INVERSIONES S.L. ("LANDIS"), by its undersigned counsel, hereby joins, adopts, and incorporates by reference the objection filed by Cravath Swaine & Moore LLP on behalf of Defendants Banque Syz & Co, S.A., Unifortune Asset Management Sgr S.P.A. and Unifortune Conservative Fund (the "Cravath Objection"), in opposition to the Trustee's Application By Order to Show Cause Seeking an Order Directing Defendants to Make Expedited Limited Initial Disclosures, or to Provide Immediate Notice of Certain Adversary Proceedings ("Application"), filed by Irving H. Picard ("Trustee"), as trustee for the substantively consolidated cases of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff.

Without waiving any of its potential defenses including, without limitation, lack of personal jurisdiction, LANDIS joins in and supports each point made in the Cravath Objection (subject to the effect, if any, of privacy laws in Spain, rather than Switzerland). For the reasons set forth in the Cravath Objection, the Trustee's Application should be denied in all respects.

Dated: New York, New York  
May 14, 2012

BAKER & MCKENZIE LLP

/s/ Joseph Samet  
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